

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHANNON MAHONEY, individually and on  
behalf of herself and all others similarly  
situated,

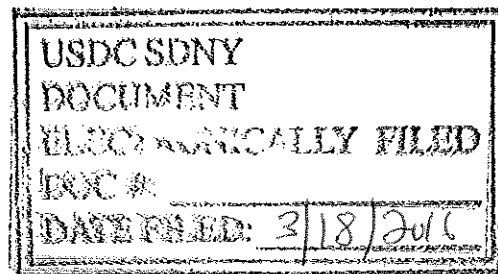
Plaintiff,

v.

ENDO HEALTH SOLUTIONS INC., a  
Delaware corporation; ENDO  
PHARMACEUTICALS INC., a Delaware  
corporation; GENERICS INTERNATIONAL  
(US PARENT), INC., a Delaware corporation  
d/b/a Qualitest Pharmaceuticals; GENERICS  
INTERNATIONAL (US), INC., a Delaware  
corporation; GENERICS BIDCO I, LLC, a  
Delaware limited liability company;  
GENERICS BIDCO II, LLC, a Delaware  
limited liability company; GENERICS  
INTERNATIONAL (US HOLDCO), INC., a  
Delaware corporation; GENERICS  
INTERNATIONAL (US MIDCO), INC., a  
Delaware corporation; and VINTAGE  
PHARMACEUTICALS, LLC, a Delaware  
limited liability company,

Defendants.

Civil Action No. 1:15-cv-09841 (DLC)



**HIPAA QUALIFIED PROTECTIVE ORDER**

Plaintiff Shannon Mahoney and Defendants (collectively, the "Parties") hereby stipulate to and petition the Court to enter the following protective order in accordance with the requirements of the regulations promulgated under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), specifically 45 C.F.R. §§ 164.512(e)(1)(ii)(B), 164.512(e)(1)(v), to enable the production and limit the use or disclosure of "protected health information" (as defined below) in this matter:

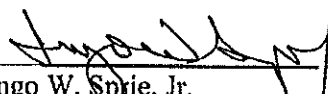
1. This HIPAA Qualified Protective Order, as that term is defined in 45 C.F.R. § 164.512(e), requires, for all protected health information obtained from a HIPAA “covered entity” or “business associate” of such a covered entity (as those terms are defined in 45 C.F.R. § 160.103), whether in response to a subpoena, discovery request, or other lawful process that is not accompanied by an order of the Court, that all parties be:

- a) prohibited from using or disclosing the protected health information for any purpose other than the litigation of this lawsuit; and
- b) required to either (i) return to the disclosing covered entity or business associate or (ii) destroy the protected health information (including all copies made) at the conclusion of the litigation of this lawsuit and all appellate proceedings at any level.

2. For the purposes of this HIPAA Qualified Protective Order, “protected health information” shall have the same scope and definition as set forth in 45 C.F.R. § 160.103; *i.e.*, “protected health information” is information that (1) has been created or received by a HIPAA covered entity or an employer, (2) relates to (a) the past, present, or future physical or mental condition of an individual, (b) the provision of health care to an individual, or (c) the past, present or future payment for the provision of health care to an individual, and (3) identifies the individual or reasonably could be expected to be used to identify the individual.


3. Documents covered by this HIPAA Qualified Protective Order may also be designated Confidential under the terms of the separate Stipulated Protective Order entered in this matter if those documents meet the criteria for Confidential Information set out in that separate Order.

*So ordered.*  
*James L. Cox*  
*March 18, 2016*

  
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*Attorneys for Plaintiff*

Dated: March \_\_, 2016

SO ORDERED:

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Hon. Denise L. Cote

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